

I will refer the matter to the Magistrate Judge for settlement purposes.

Any deadlines are stayed pending proceedings those discussions. The parties shall provide a joint status update no later than 3/11/24. The Clerk of Court is respectfully directed to terminate ECF No. 31.

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SO ORDERED.


CATHY SEIBEL, U.S.D.J.

-----X
PROJECT VERITAS and PROJECT
VERITAS ACTION FUND,

Plaintiffs,

-against-

JAMES O'KEEFE, TRANSPARENCY 1,
LLC d/b/a O'KEEFE MEDIA GROUP, RC
MAXWELL, and ANTHONY
IATROPOULOS,

Defendants.
-----X

Civil Action No. 7:23-cv-04533

1/9/24

**JOINT MOTION FOR ORDER
REFERRING CASE TO MEDIATION**

NOW COME Plaintiffs Project Veritas and Project Veritas Action Fund ("Plaintiffs") and Defendants James O'Keefe and Transparency 1, LLC d/b/a O'Keefe Media Group ("O'Keefe Defendants"), RC Maxwell, and Anthony Iatropoulos (collectively "the Parties"), and hereby request that this Court enter an Order pursuant to Local Civil Rule 83.9 and the Court's Mediation Program Procedures referring this matter for a Settlement Conference before a Magistrate Judge of this Court, and to stay proceedings pending the outcome of the Settlement Conference.

During the pendency of this case, the Parties, particularly Plaintiffs and the O'Keefe Defendants, had been negotiating toward reaching a settlement. Instead of making potentially unnecessary expenditures through the exchanging of written discovery, the taking of depositions, and dispositive motion practice, the Parties believe that a Magistrate Judge of this Court would be effective in a Settlement Conference. And, in furtherance thereof, proceedings in this matter should be stayed during the pendency of ADR proceedings in order to ensure those costs are avoided.

WHEREFORE the Parties respectfully request this Honorable Court stay proceedings and refer the matter to a Magistrate Judge to conduct a Settlement Conference.

Dated: January 9, 2024.

/s/ Jay M. Wolman

Jay M. Wolman (JW0600)
RANDAZZA LEGAL GROUP, PLLC
100 Pearl Street, 14th Floor
Hartford, CT 06103
Tel: (888) 887-1776
Email: jmw@randazza.com

*Counsel for Plaintiffs,
Project Veritas and Project Veritas
Action Fund.*

Respectfully Submitted,

/s/ Seldon J Childers

Seldon J. Childers
Childers Law, LLC
2135 NW 40th Terrace, Suite B
Gainesville, FL 32605
Tel: (352) 335-0400
Email: jchilders@smartbizlaw.com

*Counsel for Defendants,
James O'Keefe and O'Keefe Media Group.
RC Maxwell, and Anthony Iatrooulos*

Civil Action No. 7:23-cv-04533

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on January 9, 2024, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that a true and correct copy of the foregoing document is being served via transmission of Notices of Electronic Filing generated by CM/ECF.

Respectfully Submitted,

/s/ Jay M. Wolman

Jay M. Wolman (JW0600)